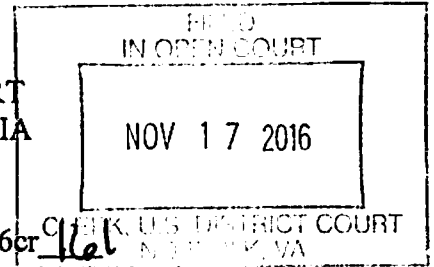


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

STERLIN D. WILLIAMS,

Defendant.

) Criminal No. 2:16cr-161
)
) 18 U.S.C. § 2251(a)
) Production of Child Pornography
) (Counts One and Two)
)
) 18 U.S.C. § 2252A(a)(5)(B)
) Possession of Child Pornography
) (Count Three)
)
) 18 U.S.C. § 2253
) Criminal Forfeiture

INDICTMENT

November 2016 Term -- At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about June 13, 2015, in the Eastern District of Virginia, the defendant STERLIN D. WILLIAMS did knowingly employ, use, persuade, induce, entice, and coerce L.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit: a video entitled "\$RJAUBJQ."

(In violation of Title 18, United States Code, Sections 2251(a) and (e).)

COUNT TWO

On or about July 1, 2015, in the Eastern District of Virginia, the defendant STERLIN D. WILLIAMS did knowingly employ, use, persuade, induce, entice, and coerce L.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and which visual depiction was produced using materials that have been mailed,

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shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit: videos entitled “\$RGLCIM6” and “\$RKWARIB.”

(In violation of Title 18, United States Code, Sections 2251(a) and (e).)

COUNT THREE

On or about July 1, 2015, in the special maritime and territorial jurisdiction of the United States of America and in the Eastern District of Virginia, the defendant STERLIN D. WILLIAMS, did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been so mailed, shipped and transported, by any means including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, and such visual depictions are of such conduct., to wit: the defendant knowingly possessed a Toshiba Satellite Laptop, Model P755-S5174, SN ZB215769K, which contained videos entitled “\$RJAUBJQ,” “\$RGLCIM6,” and “\$RKWARIB.”

(In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2), 2256(1) and (2).)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER ALLEGES THAT:

A. Defendant STERLIN D. WILLIAMS, upon conviction of any count in this Indictment, as part of the sentencing of the defendant pursuant to Fed.R.Crim.P. 32.2, shall forfeit to the United States:

1. Any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260

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produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

2. Any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property;

3. Any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*; and

4. Any other property of the defendant, up to the value of the property subject to forfeiture, if any property subject to forfeiture, as a result of any act or omission of the defendant (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty.

B. The property subject to forfeiture under Paragraph A includes, but is not limited to, the following items seized from the defendant in or around February 2016:

One (1) Toshiba Satellite Laptop, Model P755-S5174, SN ZB215769K with Toshiba 750 GB Hard Drive, Model MK757GSX, Serial Number Z15ISCXKS;

(All pursuant to Title 18, United States Code, Sections 2253 and 981(a)(1)(C); Title 28, United States Code, Section 2461(c); and Title 21, United States Code, Section 853(p).)

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Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

A TRUE BILL:

Redacted

FOREPERSON

Dana J. Boente
UNITED STATES ATTORNEY

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